

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MICHAEL McCLAIN,
ANNE PRAMAGGIORE,
JOHN HOOKER, and
JAY DOHERTY

No. 20 CR 812

Hon. Harry D. Leinenweber

GOVERNMENT'S PROPOSED STATEMENT OF THE CASE

The government respectfully submits the following statement of the case for presentation to the venire:

The indictment in this case charges that defendants Michael McClain, Anne Pramaggiore, John Hooker, and Jay Doherty committed three crimes. First, the indictment charges that defendants McClain, Pramaggiore, Hooker, and Doherty conspired to commit the offenses of corruptly soliciting things of value, corruptly giving and offering to give things of value, and circumventing internal accounting controls and falsifying books, records, or accounts of ComEd and Exelon. Second, the indictment charges that defendants McClain, Pramaggiore, Hooker and Doherty corruptly offered and agreed to give things of value. Third, the indictment charges that defendants McClain, Pramaggiore, Hooker and Doherty falsified the books and records of ComEd and Exelon. The defendants have pled not guilty to all charges.

The government has conferred with defense counsel, and understands that the defendants object to the government's proposed statement of the case.

Respectfully submitted.

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United States Attorney

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